

EXHIBIT E

SUPPLEMENTAL APPROVAL NOTICE (WITH AFFIDAVIT)

Court File No.: CV-12-9667-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE

COMMERCIAL LIST

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.
1985, c. C-36, AS AMENDED, AND IN THE MATTER OF A PLAN OF COMPROMISE
OR ARRANGEMENT OF SINO-FOREST CORPORATION**

Court File No.: CV-11-431153-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

**THE TRUSTEES OF THE LABOURERS' PENSION FUND OF CENTRAL AND
EASTERN CANADA, THE TRUSTEES OF THE INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 793 PENSION PLAN FOR OPERATING
ENGINEERS IN ONTARIO, SJUNDE AP-FONDEN, DAVID GRANT
and ROBERT WONG**

Plaintiffs

- and -

**SINO-FOREST CORPORATION, ERNST & YOUNG LLP, BDO LIMITED (formerly
known as BDO MCCABE LO LIMITED), ALLEN T.Y. CHAN, W. JUDSON MARTIN,
KAI KIT POON, DAVID J. HORSLEY, WILLIAM E. ARDELL, JAMES P. BOWLAND,
JAMES M.E. HYDE, EDMUND MAK, SIMON MURRAY, PETER WANG, GARRY J.
WEST, PÖYRY (BEIJING) CONSULTING COMPANY LIMITED, CREDIT SUISSE
SECURITIES (CANADA), INC., TD SECURITIES INC., DUNDEE SECURITIES
CORPORATION, RBC DOMINION SECURITIES INC., SCOTIA CAPITAL INC., CIBC
WORLD MARKETS INC., MERRILL LYNCH CANADA INC., CANACCORD
FINANCIAL LTD., MAISON PLACEMENTS CANADA INC., CREDIT SUISSE
SECURITIES (USA) LLC and MERRILL LYNCH, PIERCE, FENNER & SMITH
INCORPORATED (successor by merger to Banc of America Securities LLC)**

Defendants

Proceeding under the *Class Proceedings Act*, 1992

AFFIDAVIT OF GARTH MYERS

(Sworn October 26, 2015)

I, GARTH MYERS, of the City of Toronto, in the Province of Ontario AFFIRM:

1. I am an associate at Koskie Minsky LLP, who, along with Siskinds LLP (together, "Class Counsel"), are counsel to the plaintiffs in the above-captioned class proceeding (the "Class Plaintiffs"). I have knowledge of the matters deposed to below. Where I make statements in this affidavit that are not within my personal knowledge, I have indicated the source of my information and believe such information to be true.

2. I swear this affidavit to supplement my affidavit sworn April 8, 2015 in respect of the Class Plaintiffs' compliance with the court-ordered notice of the hearing to approve: (a) the proposed settlement between the Ad Hoc Committee of Purchasers of the Applicant's Securities and Credit Suisse Securities (Canada) Inc., TD Securities Inc., Dundee Securities Corporation, RBC Dominion Securities Inc., Scotia Capital Inc., CIBC World Markets Inc., Merrill Lynch Canada Inc., Canaccord Financial Ltd., Maison Placements Canada Inc., Credit Suisse Securities (USA) LLC and Merrill Lynch, Pierce, Fenner & Smith Incorporated (successor by merger to Banc of America Securities LLC) (the "Dealers") and (the "Settlement"); (b) class counsel fees; and (c) the claims and distribution protocol.

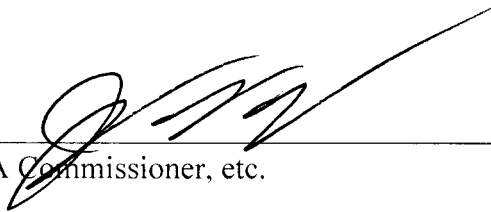
3. The motion to approve the Settlement, class counsel fees and the claims and distribution protocol was initially returnable on May 11, 2015. Notice of this hearing was provided in accordance with the order of this court dated January 29, 2015. In response to the Notice, the Ad Hoc Committee of Purchasers of the Applicant's Securities received 31 objection forms, one of which has been withdrawn (the defendant BDO Limited) (the "Objectors").

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4. The hearing of these motions was adjourned pending the resolution of a threshold issue. This threshold issue has now been resolved and the hearing of the motions to approve: (a) the Settlement; (b) class counsel fees; and (c) the claims and distribution protocol has been rescheduled for October 30, 2015.

5. The Ad Hoc Committee of Purchasers of the Applicant's Securities provided notice of the October 30, 2015 hearing to the Objectors by email (or where email was not available, by regular mail). Notice was delivered on October 22 and 26, 2015. Attached hereto as **Exhibit "A"** is a copy of the Notice. No Objectors have advised that they intend to attend the hearing on October 30, 2015.

SWORN before me at the City of)
Toronto, in the Province of Ontario,)
this 26th day of October, 2015.)



A Commissioner, etc.)

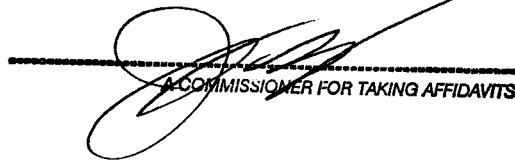


GARTH MYERS)

This is Exhibit A referred to in the
affidavit of Garth Myers
sworn before me, this 26
day of October 2015

October ●, 2015

Communications Department
Toll Free Hotline: 1-866-474-1739
Email: sinoforestclassaction@kmlaw.ca


A COMMISSIONER FOR TAKING AFFIDAVITS

Dear ●:

Re: Sino Forest Class Action

We received your objection to the motion relating to settlement with the Underwriters. Your objection was filed with the Ontario Superior Court of Justice (the "Ontario Superior Court") and brought to the court's attention.

Please be advised that arising from an objection by the Litigation Trust and an Order of the Ontario Superior Court directing the parties to mediate, an agreement in principle (subject to final terms) was reached with the Litigation Trust providing for additional amounts to be paid to the Litigation Trust by the Underwriter defendants (\$1 million) as well as from the Settlement Trust (\$750,000). Rather than deduct the funds from the amounts which were to be distributed to class members, class counsel has agreed to reduce its fee request by \$750,000, from \$5,517,207 to \$4,767,207, plus HST and disbursements.

A further attendance has been scheduled to address the motion to approve: (a) the settlement; (b) the claims and distribution protocol; and (c) class counsel fees, on October 30, 2015 at 11:00 am at the Ontario Superior Court of Justice, 330 University Avenue, 8th Floor, Toronto, Ontario (the "Approval Hearing").

If the Ontario Superior Court enters an order approving the Settlement, a hearing to consider recognition and enforcement of such order in the United States (the "Recognition Hearing") will be held in the chapter 15 recognition proceedings styled as *In re Sino-Forest Corporation*, Case No. 13-10361 (MG) (Bankr. S.D.N.Y.) before Judge Martin Glenn in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on a date to be determined. You will receive a further notice once the date for the Recognition Hearing has been scheduled.

You are entitled to attend the Approval Hearing and the Recognition Hearing, if you wish. Please advise Garth Myers (gmyers@kmlaw.ca) if you intend to attend the Approval Hearing and/or the Recognition Hearing.

Regards,

Communications Department

Koskie Minsky LLP | Barristers & Solicitors

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www.kmlaw.ca/sinoforestclassaction

ONTARIO

SUPERIOR COURT OF JUSTICE

Proceeding commenced at Toronto

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF GARTH MYERS

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Lawyers for the Ad Hoc Committee of Purchasers of the
Applicant's Securities, including the Class Action Plaintiffs